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*Attorneys for Plaintiff*  
*ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG; ILIOS  
CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280

**PLAINTIFF'S APPLICATION FOR  
LEAVE TO FILE DOCUMENTS  
UNDER SEAL**

Judge: Hon. \_\_\_\_\_

Action Filed: September 25, 2024

**APPLICATION TO FILE DOCUMENTS UNDER SEAL**

Plaintiff Electric Solidus, Inc. (“Swan”), by and through undersigned counsel and pursuant to Central District Local Rule 79-5.2.2(a), hereby files this Application for Leave to File Documents Under Seal in Support of Plaintiff’s Complaint and of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction.

Plaintiff seeks leave to file under seal (i) Exhibit B to the Declaration of Ilissa Samplin in Support of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the “Samplin Declaration in Support of TRO”); (ii) Exhibit C to Samplin Declaration in Support of TRO; (iii) an unredacted version of portions of Plaintiff’s Complaint that references or quotes content from other commercially sensitive documents; (iv) an unredacted version of portions of Exhibit J to the Declaration Of Yan Pritzker In Support Of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the “Pritzker Declaration in Support of TRO”); (v) an unredacted version of portions of the Declaration Of Cory Klippsten In Support Of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the “Klippsten Declaration in Support of TRO”); and (vi) an unredacted version of portions of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (“Plaintiff’s TRO Brief”) that quotes or contains commercially sensitive content from Exhibits B and C to the Samplin Declaration in Support of TRO, the Klippsten Declaration in Support of TRO, and Exhibit J to the Pritzker Declaration in Support of TRO.

1 This Application is accompanied by the Declaration of Ilissa Samplin in Support  
2 of Plaintiff's Application for Leave to File Documents Under Seal ("Samplin  
3 Declaration"), a proposed order, and unredacted versions of the foregoing documents  
4 Plaintiff seeks leave to file under seal.

5 Plaintiff thus respectfully requests an order granting it leave to file under seal (i)  
6 Exhibit B to the Samplin Declaration in Support of TRO; (ii) Exhibit C to Samplin  
7 Declaration in Support of TRO; (iii) those portions of Plaintiff's Complaint discussing  
8 commercially sensitive confidential business information; (iv) those portions of Exhibit  
9 J to the Pritzker Declaration in Support of TRO discussing commercially sensitive  
10 confidential business information; (v) those portions of the Klippsten Declaration in  
11 Support of TRO discussing commercially sensitive confidential business information;  
12 and (vi) those portions of Plaintiff's TRO Brief discussing commercially sensitive  
13 confidential business information. For the reasons set forth in the Samplin Declaration,  
14 there is good cause and compelling reasons to file these documents under seal.

15  
16 Dated: September 26, 2024

GIBSON, DUNN & CRUTCHER LLP

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18 By: /s/ Ilissa Samplin

19 Ilissa Samplin

20 *Attorneys for Plaintiff*  
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